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## LOS ANGELES POLICE DEPARTMENT

WILLIAM J. BRATTON Chief of Police



P. O. Box 30158 Los Angeles, California 90030 Telephone: (213) 485-4130 TDD (877) 275-5273 Ref. No.: 8.7

January 13, 2005

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Marlene H. Dortch, Secretary Federal Communications Commission 445 12<sup>th</sup> Street, SW Washington, DC 20554

Re: Petition for Rulemaking of LoJack Corporation

Dear Ms. Dortch:

The Los Angeles Police Department strongly supports the above referenced Petition for Rulemaking filed by the LoJack Corporation (LoJack) requesting that the Commission expand the permitted uses, and modify the technical requirements for operations on 173.075 MHz.

The Los Angeles Police Department also supports LoJack's request, in the comments it filed in ET Docket Number 04-243 that the Commission provides for a 14-year transition period commencing with the effective date of the final rules in the proceeding, to convert to narrow band operations on 173.075 MHz.

As described in the petition, LoJack seeks rule changes to allow it to provide public safety entities with additional services that will help these entities function better. Lojack also seeks changes to the technical rules that, in addition to facilitating these additional services will enable LoJack to improve the performance of its stolen vehicle recovery network and to compensate for the effects of converting to narrow band operations. We believe LoJack's network enhancement will benefit us greatly.

The Los Angeles Police Department utilizes the LoJack System in its vehicles to assist in the recovery of stolen vehicles. This technology has improved our recovery rates and has increased our ability to apprehend offenders. Using the LoJack System, we believe our officers may carry out their mission in a much safer manner.

The Los Angeles Police Department would use and benefit from LoJack's proposed new services. For example, by obtaining the position of stolen vehicle via Global Positioning Satellite (GPS), we will be able to dispatch LoJack System-equipped police vehicles to the general area where the stolen vehicles are located, and then perform the final tracking and recovery with the traditional LoJack tracking computer.

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We believe this improvement will make police operations more efficient and significantly reduce the time elapsed from the theft of a vehicle and its recovery. This equates to far less damage to recovered vehicles and improved recovery rates.

As our country becomes a target for terrorist activities, we are increasingly concerned regarding the movement of hazardous and dangerous cargoes. LoJack's cargo-tracking devices will enable us to track and recover stolen cargo that could threaten public safety and national security throughout North America. This will be accompanied by establishing a police-operated national database of LoJack-equipped cargo containers which can be queried by any law enforcement agency in the United States.

We also support LoJack's concept of including additional public safety and security features in its network. In addition to stolen vehicle recovery, LoJack may provide automatic notification of a severe traffic accident, including the location of the accident, directly to public safety agencies. The network may also indicate the need for emergency medical or other assistance as appropriate. Finally, we support LoJack's concept of tracking individuals who are at risk, either to themselves or to the community, including Alzheimer's patients, autistic children, and candidates for home arrest.

We respectfully ask the Commission to initiate the rulemaking LoJack has proposed in its petition. We also urge the Commission to provide LoJack with a 14-year period to complete its transition to the new narrow band operations.

Very truly yours,

WILLIAM J. BRATTON

Chief of Police

RICHARD A. MERAZ Commanding Officer

Commercial Crimes Division

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